

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re Century 21 Department Stores, LLC Fair and  
Accurate Credit Transaction Act (FACTA) Litigation.

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12 MDL 2352  
(RWS)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 9/26/12
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**STIPULATION AND [PROPOSED]  
SCHEDULING ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1. Plaintiffs may file an amended consolidated complaint on or before October 1, 2012.
2. Defendant Century 21 may answer or move against such amended consolidated complaint on or before October 31, 2012. In the event that plaintiffs file an amended consolidated complaint and Defendant Century 21 files a motion to dismiss such amended consolidated complaint, the parties agree to meet and confer regarding whether discovery should be stayed pending resolution of such motion. Century 21 reserves the right to seek a stay from the Court if the parties do not agree.
3. Plaintiffs who have not previously served initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall do so on or before October 31, 2012.
4. Written discovery, including document requests, interrogatories, and requests for admission, shall commence on November 1, 2012.
5. Fact depositions shall commence on February 1, 2013 and conclude on or before April 30, 2013.
6. Plaintiffs shall file a motion for class certification on or before May 31, 2013.

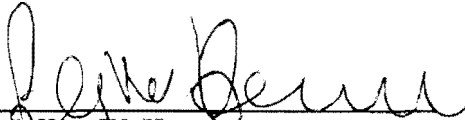
7. Defendant Century 21 shall file its opposition to such motion for class certification on or before July 1, 2013.
8. Plaintiffs shall file their reply in further support of such motion for class certification on or before July 31, 2013.
9. Following the resolution of such motion for class certification, the parties shall meet and confer and submit a proposed schedule for merits expert discovery, summary judgment motions, and other remaining items.

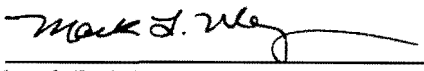
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Date: 9/24/12

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SO ORDERED: 

DATE: 9.24.12